



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

July 4, 2020

By Email and ECF

Hon. Alvin K. Hellerstein
United States District Judge
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, New York 10007

Re: *United States v. Joel Cabrera*, 20 Cr. 172 (AKH)

Dear Judge Hellerstein:

The parties jointly write to request that the Court adjourn for approximately 30 days the status conference in the above-referenced matter currently scheduled for July 8, 2020.

The Government further requests that the time between today and the conference date set by the Court be excluded pursuant to the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), in light of the COVID-19 pandemic and its resulting limitations on court appearances and the ability of defense counsel to meet with his client, and to allow the parties to attend to their discovery obligations and to engage in discussions regarding a potential pretrial resolution of this matter. The Government respectfully submits that the proposed exclusion would be in the interest of justice.

Respectfully Submitted,

AUDREY STRAUSS
Acting United States Attorney

by: /s/

Daniel H. Wolf
Assistant United States Attorney
(212) 637-2337

cc: Robert Osuna, Esq. (by ECF)

*Conf is adjourned at
until August 10, 2020 at
11:00am. Time is excluded
until 8/10/20; in the interest
of justice.*
[Signature]
7/6/2020